

### REMARKS/ARGUMENTS

Claims 12-18 remain in this application. Applicants request reconsideration of this application in view of these remarks and arguments.

The Examiner has rejected Claims 12-13 under 35 U.S.C. 102(b) as being anticipated by Gardeck, et al. (USPN 5,471,532). Applicants traverse these rejections.

Gardeck, et al. discloses the use of multiple Key Management Controllers (referred to generally as “key units” to send updated key information to roaming communication units. The patent is very clear that “the present invention provides for a method for *over-the-air rekeying* of roaming communication units” (Abstract; col. 1, lines 61-61). No manual key delivery device is used in the Gardeck, et al. reference to update the communication units, only the centralized key management controller or KMC.

Thus, Gardeck, et al. fails to disclose the limitations recited in Claim 12 and included by dependency in Claim 13 of “*receiving by a manual key delivery device* from a centralized key management facility that is remote from the manual key delivery device, one or more key management messages including indicia of respective target communication devices that are to receive the key management messages; *operably connecting the key delivery device* to one or more candidate encryption devices; *determining, by the key delivery device* upon connecting to the one or more candidate encryption devices and based on the indicia included in the one or more received key management messages, which ones of the candidate encryption devices are target encryption devices; and *delivering, from the key delivery device*, one or more key management messages to the candidate encryption devices determined by the key delivery device to be target encryption devices.”

Based on the above argument that Gardeck, et al. fails to disclose all of the limitations recited in Claim 12 and included by dependency in Claim 13, Applicants believe that the Gardeck, et al. reference does not anticipate Claims 12-13. Applicants, therefore, request that the Examiner remove the §102 rejections of these claims based on this reference.

The Examiner has further rejected: Claim 14 under 35 U.S.C. 103(a) as being unpatentable over Gardeck, et al. in view of Doiron (USPN 5,481,610); Claim 15 under 35 U.S.C. 103(a) as being unpatentable over Gardeck, et al. in view of Miller (USPN 6,208,612); and Claims 16-18 under 35 U.S.C. 103(a) as being unpatentable over Gardeck, et al. in view of Schneier (Schneier, Bruce, Applied Cryptography, CRC Press, 1996, pages 1-2). Applicants traverse these rejections. Claims 14-18 depend from and include all of the limitations of Claim 12. As argued above, the primary reference Gardeck, et al. used in rejecting Claims 14-18 is missing limitations from Claim 12 and, thereby, from Claims 14-18. Moreover, none of the other referenced cited by the Examiner disclose the limitations missing from the Gardeck, et al. reference.

For these reasons, Applicants believe that no combination of references cited by the Examiner renders obvious Claims 14-18, and that the Examiner should therefore remove the §103 rejections of these claims.

No amendment made was related to the statutory requirements of patentability unless expressly stated herein. No amendment made was for the purpose of narrowing the scope of any claim, unless Applicant has argued herein that such amendment was made to distinguish over a particular reference or combination of references.

The Applicants believe that the subject application, as amended, is in condition for allowance. Such action is earnestly solicited by the Applicants.

In the event that the Examiner deems the present application non-allowable, it is requested that the Examiner telephone the Applicant's attorney at the number indicated below so that the prosecution of the present case may be advanced by the clarification of any continuing rejection.

Please charge any fees that may be due to Deposit Account 502117, Motorola, Inc.

Respectfully submitted,

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